

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:	:	Chapter 11
	:	
RUFFING CARE, INC.,	:	Case No. 15-32960-MAW
	:	
<u>Debtor and Debtor in Possession</u>	:	Judge Mary Ann Whipple
In re:	:	Chapter 11
	:	
STJ HEALTHCARE, INC.,	:	Case No. 15-32962-MAW
	:	
<u>Debtor and Debtor in Possession</u>	:	Judge Mary Ann Whipple

**MOTION FOR ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER
11 CASES PURSUANT TO RULE 1015(b) OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE**

Ruffing Care, Inc. (“Ruffing - Tiffin”) and its affiliated debtor STJ Healthcare, Inc. (“Ruffing - Bloomville” and together with Ruffing - Tiffin, the “Debtors”), as debtors and debtors in possession in the above-captioned Chapter 11 cases, submit this motion (“Motion”) for entry of an order, pursuant to Federal Rule of Bankruptcy Procedure (“Bankr. Rule”) 1015(b), directing the joint administration of these cases for procedural purposes only. In support hereof the Debtors respectfully represent as follows:

Jurisdiction, Venue and Bases for Relief

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of this case and this Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409. Bankr. Rule 2015(b) provides the basis for the relief sought herein.

Background

2. On the date hereof (the “Petition Date”), the Debtors filed with this Court their respective voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

The Debtors are continuing in the possession of their properties and the operation of their businesses as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

3. The Debtors are Ohio corporations engaged in the operation of nursing facilities located at 2320 W. County Road 6, Tiffin, Ohio 44883 and 22 Clinton Street, Bloomville, Ohio. The Debtors have recently implemented reorganizations of their management in order to reverse historical losses and have therefore determined to commence their cases to facilitate the restructuring of their operations and to feasibly address their indebtedness to their creditors.

Relief Requested

6. By this Motion, the Debtors request, pursuant to Bankr. Rule 1015(b), entry of an order directing the joint administration of the Debtors' chapter 11 cases for procedural purposes only.

Basis for Relief Requested

7. Bankr. Rule 1015(b) provides, in relevant part, that "[i]f ... two or more petitions are pending in the same court by or against ... a debtor and an affiliate, the court may order joint administration of the estates." Fed. R. Bankr. P. 1015(b). The Debtors are "affiliates" as defined in Section 101(2) of the Bankruptcy Code by virtue of their common ownership. Accordingly, this Court is authorized to order joint administration of these cases for procedural purposes.

8. Because joint administration of these cases will remove the need to prepare, replicate, file and serve duplicative notices, applications and orders, the Debtors and their estates will save substantial time and expense. Further, joint administration will

relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. The United Trustee and other parties in interest will similarly benefit from joint administration of these Chapter 11 cases by sparing them the time and effort of reviewing duplicative pleadings and papers.

9. Joint administration will not adversely affect creditors' rights because this motion requests only the joint administrative of the estates. As such, each creditor may still file its claim against a particular estate.

10. Accordingly, the Debtors respectfully request that the caption of their cases be modified as follows:

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

In re:	:	Chapter 11
	:	
RUFFING CARE, INC., <i>et al.</i> ,	:	Case No. 15-32960-MAW
	:	(Jointly Administered)
<u>Debtors and Debtors in Possession</u>	:	Judge Mary Ann Whipple

11. The Debtors also seek the Court's direction that a notation substantially similar to the following be made in both of these chapter 11 cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Ruffing Care, Inc. and STJ Healthcare, Inc. The docket in Case No. should be consulted for all matters affecting these cases.

12. Based on the foregoing, the Debtors submit that the relief requested is necessary and appropriate and in the best interests of their estates and creditors and that the Motion should be granted in all respects.

WHEREFORE, the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: September 10, 2015

Respectfully submitted,

/s/ Jeffrey M. Levinson

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Proposed Counsel for the Debtors

And the Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on September 10, 2015 a true and correct copy of the foregoing *Motion for Joint Administration* was served:

Via the Court's Electronic Case Filing System on those entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of the United States Trustee – General Electronic Mailbox

Dated: September 10, 2015

/s/ Jeffrey M. Levinson

Jeffrey M. Levinson